



START NEW FINANCIAL **PRIVACY POLICY**

Start New Settlement, LLC d/b/a Start New Financial (“Start New,” “we,” or “us”) understands that the control and security of your personal information is important. Start New has, accordingly, adopted this Privacy Policy (the “Policy”) to explain how Start New handles personal information, including when Start New may share personal information and when customers can limit Start New’s sharing of personal information.

Start New collects personal information from potential customers and customers (“customers”) related to the debt-settlement services Start New provides (the “Services”). Start New may collect personal information from customers through telephone conversations, Start New’s website (the “Site”), email or other electronic means, the mail, etc. This Policy governs Start New’s handling of all personal information Start New receives from customers, regardless of the way the customer conveys the personal information.

Before using the Site or utilizing the Services, you should review this Policy, in addition to the Terms and Conditions published on the Site. By using the Site or the Services, you agree to the collection, processing, use, and disclosure of your personal information as set forth in this Policy. If you do not agree with this Policy, you are not authorized to, and you may not, access or use the Site or our Services.

Start New reserves the right to revise this Policy at any time, in our discretion, and for any or no reason. Such revisions shall be effective ten (10) days from the date of posting such updated Policy to the Site. In the event Start New revises this Policy, your continued use of the Site or the Services represents your acknowledgment and agreement to the terms of the updated Policy. You should, accordingly, periodically review this Policy.

What information do we collect?

When you create an account on the Site (if applicable); interact with us through the Site, through other electronic means, through the phone, or in person; use our Services; or otherwise use or visit the Site, we may collect information about you, including information that, on its own or in combination with other information, identifies you personally or that relates to non-public personal matters, like your finances. For example, we may collect your name, contact information, social security number, financial and credit history, credit card information, and other information related to the debts you may owe. We may also collect information through our Site through “cookies.” You are free to limit our ability to collect information through cookies by changing settings on your browser or by downloading an opt-out browser add-on. If you change

your browser’s settings to prevent our ability to gather information through cookies, your ability to access the Site may be limited. Please be aware that, unless you take one or more of these steps, you consent and agree to accepting cookies through the Site and to our ability to access information by way of these cookies.

How do we use personal information?

We use the personal information we collect for various purposes, including answering your questions and providing Services; to improve customer service; to contact you as needed in connection with the Services or in connection with your use of the Site; and to enhance our digital security measures. In certain instances, you may opt out of how we or third parties use the personal information we collect from you.

Reviewing Your Personal Information

You may contact us for assistance reviewing, updating, or correcting any personal information we have collected from you. We will respond within a reasonable period, or as otherwise required by law.

Safeguarding Your Personal Information

We maintain reasonable administrative, physical, and technical measures to protect the confidentiality of your personal information. No website, however, is completely secure. We cannot guarantee that your personal information will not be disclosed, misused, or lost by accident or by the unauthorized acts of others. We expressly disclaim all liability arising therefrom.

How We Share Your Information

All financial organizations need to share customer personal information to provide the programs and services requested by the customer. Please review the section below, which contains the primary reasons we may share customers’ personal information and whether you can limit this sharing.

<u>Reasons for sharing personal information</u>	<u>Do we share?</u>	<u>Can you limit our sharing?</u>
For everyday business purposes (e.g., providing Services, processing transactions, maintaining/servicing your account, responding to legal process or mandatory reporting, etc.)	Yes	No
For internal marketing purposes (e.g., to offer programs or services to you)	Yes	Yes
For joint marketing with other financial organizations	Yes	Yes
For affiliates’ everyday business purposes (e.g., information about your creditworthiness)	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	Yes	Yes
For purposes related to internal research/analysis (e.g., to improve our services to you and to other customers)	Yes	Yes

We will offer you the opportunity to opt out as set forth in this Policy or as otherwise required by applicable law. To opt out, you may contact us as provided in this Policy.

In relation to an ongoing or proposed business transaction (such as transferring the ownership and operation of Start New), we may sell or transfer your information to a successor or potential successor organization, including through bankruptcy. Any third party to whom we sell or transfer assets will have the right to continue to use your personal information in the manner described in this Policy and subject to any preferences you have expressed to us.

We may also share personal information if we, in good faith, believe disclosure is appropriate or required to comply with existing law, a court order, or a subpoena. We may also share your personal information with law enforcement or another third party to prevent or investigate a possible crime; to protect the security of the Site or our Services; to enforce our policies and agreements; or to protect our own rights or property or the rights, property, or safety of others.

We may retain your personal information as needed to maintain the Site and provide you with Services; to comply with legal obligations, meet applicable regulatory requirements, resolve any disputes or litigation, or as otherwise needed to enforce this policy; and to prevent fraud.

We reserve the right to disclose personal information as described in any applicable privacy notice posted on the Site, or as described in any other agreement with us.

Privacy Rights Applicable to California Residents

California residents who have an established business relationship with us may request and obtain, free of charge and on an annual basis, information about personal information we shared with other businesses for their own direct marketing use within the prior calendar year. If applicable, this information would include a list of categories of personal information shared with third parties and the names and addresses of all third parties with which we shared this information in the immediately preceding calendar year. To obtain this information, please contact us at the number of address below. Let us know you have a “California Shine the Light Privacy Request.” We will then respond to you with the require information.

If you are a California resident and you are under the age of 18, you may request that we remove content or information you have posted to our Site by contacting us using the contact information below.

Privacy Rights Applicable to Montana Consumers

Notwithstanding anything in this Policy to the contrary, we will not share the personal information of Montana residents with whom we have an established business relationship with anyone other than (i) the customer’s creditors and (ii) our agents, affiliates, or contractors. Our ability to share Montana customers’ personal information with our agents, affiliates, and contractors is subject to such customers’ rights to limit our sharing of personal

information as set forth in this Policy. We also will not disclose the name of a Montana customer's creditor(s) to anyone other than the customer, a company acting on behalf of the customer, a company acting on our behalf, or another creditor of the customer and then only to the extent necessary to secure the cooperation of a creditor with a debt-settlement plan.

Contact Us

If you have any questions regarding this Policy or would like to exercise your choices as described in this Policy, please contact us at (800) 320-9083 or send us a written statement at 5366 Plainfield Ave NE, Suite B, Grand Rapids, Michigan 49525.